## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICA.

Case: 2:25-cr-20114

Assigned To: McMillion, Brandy R. Referral Judge: Altman, Kimberly G.

Assign. Date : 2/26/2025

Description: IND USA V. SEALED MATTER (MC)

v.

ERVIS CENOLLI.

**Violations:** 

21 U.S.C. § 846 21 U.S.C. § 841 18 U.S.C. § 1956

Defendant.

**Indictment** 

The Grand Jury charges that:

## Count One

Conspiracy to Possess with Intent to Distribute and to Distribute a Controlled Substance
21 U.S.C. §§ 846 & 841(a)(1)

From in or around July 21, 2021, through in or around January 2025, the defendant, ERVIS CENOLLI, knowingly and intentionally combined, conspired, confederated, and agreed with persons known and unknown to the Grand Jury, to distribute and possess with intent to

distribute a controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

With respect to defendant ERVIS CENOLLI, the controlled substances involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, are 5 kilograms or more of cocaine, its salts, optical and geometric isomers, and salts of isomers, 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, and 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A)(ii)(II) and (viii).

## Count Two Laundering of Monetary Instruments 18 U.S.C. § 1956(a)(1)(B)(i)

On or about November 15, 2022, in the Eastern District of Michigan, the defendant, ERVIS CENOLLI, knowingly conducted and attempted to conduct a financial transaction affecting interstate and

foreign commerce, that is, the transfer of United States currency, which involved the proceeds of a specified unlawful activity, that is, possession with intent to distribute and distribution of a controlled substance, a violation of Title 21, United States Code, Section 841(a)(1), and conspiracy to commit those offenses, a violation of Title 21, United States Code, Sections 846 and 841(a)(1), knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and knowing while conducting and attempting to conduct such financial transaction that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

## Forfeiture Allegations

The allegations contained in Counts 1 and 2 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture under Title 21, United States Code, Section 853.

Under Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 846, the defendant, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any mann or part, to commit, or to facilitate the commission of, the offenses.

As part of the forfeiture in this case, the United States intends to seek entry of a forfeiture money judgment.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property under Title 21, United States Code, Section 853(p).

This is a True Bill.

/s/ Grand Jury Foreperson
Grand Jury Foreperson

JULIE A. BECK Acting United States Attorney

/s/ Benjamin Coats
Benjamin Coats
Chief, Drug Task Force Unit

/s/ Thomas Franzinger
Thomas Franzinger
Assistant United States Attorney

Dated: February 26, 2025

Case: 2:25-cr-20114 Assigned To: McMillion, Brandy R. Referral Judge: Altman, Kimberly G. **United States District Court Criminal Case Cover:** Assign. Date: 2/26/2025 Eastern District of Michigan Description: IND USA V. SEALED MATTER (MC) NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects. Comitation Case Information **Companion Case Number:** This may be a companion case based upon LCrR 57.10 (b)(4)1: Judge Assigned: ⊠ <sub>No</sub> \_\_\_ ∐ Yes AUSA's Initials: 1 Case Title: USA v. ERVIS CENOLLI County where offense occurred: Wayne Check One: **⊠** Felony ■ Misdemeanor Pettv \_\_\_\_Indictment/\_\_\_\_Information --- no prior complaint. Indictment/\_\_\_Information --- based upon prior complaint [Case number: Indictment/\_\_\_Information --- based upon LCrR 57.10 (d) [Complete Superseding section below] **Superseding Case Information** Superseding to Case No: Judge: Corrects errors; no additional charges or defendants. Involves, for plea purposes, different charges or adds counts. Embraces same subject matter but adds the additional defendants or charges below: Defendant name Prior Complaint (if applicable) Charges Please take notice that the below listed Assistant United States Attorney is the attorney of record for

the above captioned case.

February 26, 2025

Thomas Franzinger, Assistant U.S. Attorney

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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.